METRO PAPER INDUSTRIES INC.

December 3, 2015

Dear Mr. Dannenberg,

Attached is the information you requested to best of my knowledge.

Laban Haverstock

Technical consultant

Metro Paper Industries of NY, Inc.

Corporate Office
90 Nolan Court, Unit 20
Markham, ON L3R 4L9
905-604-5786

U.S. Distribution
695 West End Ave
Carthage, NY 13619
315-493-3010

1. a. Metro Paper industries of New York

b. Karim Jadavji , 695 West End Ave, Carthage NY 13619

c. Incorporation – NY

d. Copy of certificate of Incorporation

e. Metro Paper Industries - owner

2. a. Metro Paper Industries of New York – 695 West End Ave

b. Metro Paper Industries – Purchased in 1999 from JCIDA, Jefferson County and still currently own.

c. 1912 – estimated

d. January 2000

e. A converter of towel and tissue products for the away from home business. Products include box facial, toilet tissue roll, folded towel and household towel. A majority of the business is contract converting for private label. Base paper is purchased on the open market.

f. Current work force – 40

g. Storm Water General Permit NYR00 0192

Water with-drawl permit – Black River- NYGL08614

Waste water permit to village- Industrial user permit, no number

Air Permit 6-2260-0020/00017 on dust collector

h. See attached schematic diagram

3. Crown Zellerback 1929 – to 1986 Direct discharge of paper manufacturing effluent to the Black River up until the 1960's or 1970's when Crown Zellerback built a primary effluent treatment plant.

James River Corp. 1986 to 1996

Fort James 1996 to 1998

Metro Paper Industries – 2000 to present

4. Industrial waste including residue from cleaning glue barrels once or twice a month, cooling water from air compressors, and yard run off of storm water. No PCB's in water. We have an agreement with the village of Carthage to send above waste to their facility. (Carthage/West Carthage POTW) 2000 to present used facility average flow: 200,000 Gal/Day.

5. See diagram

6. No sludge created in waste water or anywhere else.

7. 150,000 gal/day liquid waste water PH= 6.5-7.5. ? Heavy metals

8. a. None

b. None

c. Nonce

d. None

e. None

9. See attachments – Semi-Annual Heavy Metal Test Results

10. Mill effluent

a. liquid

b. mostly clear water

c. light brown

d. none

e. 150,000 gal/day- 4,500,000 gal month – 1,642,500,000 a year

Mill trash – in bins = 2 weeks

11. No

12. Insurance Policies- obtaining copy, will submit at a later date

13. Laban Haverstock – Technical Consultant, 2000 to 2015

14. Laban Haverstock – - Fort James 1996 to 1998 Technical Consultant

-James River 19986 to 1996

- Crown Zellerback 1966 to 1986

15. Climax manufacturing – paper maker

Carthage Machines – Chippers, Barkers

Slack Chemical – Distributor of chemicals, Industrial

16. No

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New York

County of Jefferson :

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement this response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the response thereto should become known or available to me.

LABAN HAVERSTOCK

NAME (print or type)

TECHNICAL CONSULTANT

TITLE (print or type)

Laban C Haverstock

SIGNATURE

Sworn to before me this

4 day of December, 2015

Shannon M Scherer

Notary Public

SHANNON M. SCHERER
Notary Public, State of New York
Registration #01SC6238418
Qualified In Jefferson County
Commission Expires April 4, 2019

METRO PAPER INDUSTRIES INC.

Carrie Tuttle
Carthage/West Carthage Water Pollution Control Facility
P.O. Box 302
Carthage, N.Y. 13619-0302

Subject: Semi-annual Heavy Metal Test Results

1. A 24 hour composite sample from Metro Paper Industries of New York's facility main effluent system was taken from the meter station JUN 3, 2014 It was submitted to Upstate Laboratories in Syracuse, New York for heavy metal analysis. The results of this analysis are attached.

2. I certify that the Metro Paper Industries of New York facility at 695 West End Avenue, Carthage New York, did not use Chloro Phenolic Containing Biocides/Stimacides during the period of 1 DEC 2013 - 1 JUNE 2014 This included Trichlor Phenol and Penta Chlor Phenol.

I certify under penalty of law that this document and all other attachments were prepared under my direct supervision in accordance with system designed to insure that qualified persons properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, The information submitted is to the best of my knowledge and belief, true, accurate and complete.

I am aware there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing of the violation.

Sincerely,

METRO PAPER INDUSTRIES OF NEW YORK, INC

Laban C. Haverstock
Environmental Health & Safety Specialist

Attachments: Analysis Results – Report Number

Corporate Office
111 Manville Road
Toronto, Ontario, Canada M1L 4J2

U.S. Distribution
695 West End Avenue
Carthage, NY 13619

U.S. Distributor Customer Care: 1-800-325-4758 ext. 237
Canadian Distributor Customer Care: 1-800-325-4758 ext. 300
Parent Roll Customer Care: 1-800-325-4758 ext. 238
(416) 75-PAPER (757-2737) (416) 757-0818

Converse Laboratories, Inc.
800 Starbuck Ave. Suite B101
Watertown, NY 13601
(315) 788-8388

N.Y.S. Approved ELAP
ID: 10708

U.S.P.H. Certified
36144

* Laboratory Report Form *

Metro Paper Industries of NY
Attn: Charles Shampine
695 West End Ave.
Carthage, N.Y. 13619

Client ID 7606518

Report Date 06/17/2014

Sample ID: 01404438
Sample Date: 06/03/14 Sample Time: 0900
Received Date: 06/03/14 Received Time: 1300

Sample Type: Wastewater
Sample Site: Plant
Sampled By: CLIENT

Analysis	Results	Method Code	Lab ID	Date	Time	Tech
PHOSPHORUS, TOTAL (AS P)	<0.050 mg/L	SM-21 4500-P+E	10708	6/13/2014	1020	LIM

Key: mg/L - Milligrams Per Liter
ml/L - Milliliters Per Liter
100 ml - Size of Coliform Container
CFU/ml - Colony Forming Units per Milliliter
ND - None Detected
TNTC - Too Numerous to Count

All times shown in 24 hour format

E - Estimated Value

Louann Mosher
Supervisor

ACCREDITED IN ACCORDANCE WITH nelac

The information in this report is accurate to the best of our knowledge and ability.
In no event shall our liability exceed the cost of these services.
I certify that these results conform to New York State Department of Health Standards and requirements (10 NYCRR Subpart 55 - 2).

Sample Identification	Client Project #	Matrix	Collection Date/Time	Received
Plant SB90772-01	SA14-0442 Metro Paper Industries of NY	Waste Water	03-Jun-14 09:00	05-Jun-14

CAS No.	Analyte(s)	Result	Flag	Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Cert.
Total Metals by EPA 200/6000 Series Methods													
	Preservation	Field Preserved		N/A			1	EPA 200/6000 methods			BEL	1413205	
Total Metals by EPA 200 Series Methods													
7440-22-4	Silver	< 0.0100		mg/l	0.0100	0.0031	1	EPA 200.7	11-Jun-14	17-Jun-14	EDT/T	1413394	X
7440-38-2	Arsenic	< 0.0300		mg/l	0.0300	0.0049	1	"	"	"	"	"	X
7440-43-9	Cadmium	< 0.0050		mg/l	0.0050	0.0011	1	"	"	"	"	"	X
7440-47-3	Chromium	< 0.0100		mg/l	0.0100	0.0028	1	"	"	"	"	"	X
7440-50-8	Copper	0.0124		mg/l	0.0100	0.0036	1	"	"	"	"	"	X
7439-97-6	Mercury	< 0.00020		mg/l	0.00020	0.00008	1	EPA 245.1/7470A	"	11-Jun-14	LR	1413428	X
7440-02-0	Nickel	< 0.0100		mg/l	0.0100	0.0033	1	EPA 200.7	"	17-Jun-14	EDT/T	1413394	X
7439-92-1	Lead	< 0.0150		mg/l	0.0150	0.0040	1	"	"	"	"	"	X
7440-66-6	Zinc	0.0286		mg/l	0.0100	0.0066	1	"	17-Jun-14	18-Jun-14	"	1413973	X
General Chemistry Parameters													
57-12-5	Cyanide (total)	< 0.00500		mg/l	0.00500	0.00419	1	EPA 335.4 / SW846 9012B	12-Jun-14	12-Jun-14	RLT	1413553	X

CONVERSE LABORATORIES, INC
800 Starbuck Ave., Suite B101, Watertown, NY 13601
(315) 788-8388 www.converselabs.com

Chain of Custody

Page _____ of _____

Client Name: Metro Paper Industries of NY	Client Project ID / PO# :	**Matrix Codes** DW= Drinking Water GW=Ground Water WW=Wastewater SL=Sludge SW=Surface Water SO=Soil
Client Address: 695 West End Ave.		**Sample Information:** ☐ Finished ☐ Raw ☐ Chlorinated ☐ UV ☐ OTHER: _____
Carthage, NY 13619		
Phone #: 315 493 3010 Fax#: 315 493 2641		**Preservative Codes** 1= $Na_2S_2O_3$ 2= HCl 3= H_2SO_4 4= HNO_3 5= NaOH 6= Asorbic Acid 7= NH_4CL 8= _____
E-Mail address: charlies@Metropaperindustries.com		**NOTES TO LABORATORY** ☒ Normal TAT ☐ Rush TAT Date Needed: _____ a.m. / p.m.
Contact/Report to: Charles Shampine		
Sampler:		

Date Collected	Time Collected	Sample Identification	Grab G = Composite C	Matrix - See codes above	Chlorine Residual	List Preservative Code Below	S	ANALYSIS / TEST REQUESTED	SAMPLE ID # (lab use only)
6/3/14	9:AM						X	Cd / Cr / Cu / Ni / Ag /	
6/3/14	9:AM						X	Zn / As / Pb / Hg	
6/3/14	9:AM	NaOH					X	Cyanide	
								T. Phos.	4438
								pH<2 4m 6/3/14	

Relinquished by:	Date	Time	Received by:	Date	Time	Rec'd Temp:	AUTHORIZED RECIPIENTS & CONTACT INFO:
Chuck Gilbert	6/3/14	10:50	David Z Ferry	6/3/14 16:50			email
David Z Ferry	6/3/14	13:00	CA Dom	6/3/14	1300	4.0°	SAMPLE(S) AS RECEIVED CONFORM TO NELAC STANDARDS (YES) NO IF NO, SEE ATTACHED SHEET

Doc. # 357
4/9/2014
Rev. # 13
Page 1 of 1

Amt. Due: Bill Amt. Paid: _____

Cash _____ Check# _____ CC _____

Initial Review: CA 6/3/14
Transcriptual Rev.: _____
Final Review: _____

Notes and Definitions

dry	Sample results reported on a dry weight basis
NR	Not Reported
RPD	Relative Percent Difference

Laboratory Control Sample (LCS): A known matrix spiked with compound(s) representative of the target analytes, which is used to document laboratory performance.

Matrix Duplicate: An intra-laboratory split sample which is used to document the precision of a method in a given sample matrix.

Matrix Spike: An aliquot of a sample spiked with a known concentration of target analyte(s). The spiking occurs prior to sample preparation and analysis. A matrix spike is used to document the bias of a method in a given sample matrix.

Method Blank: An analyte-free matrix to which all reagents are added in the same volumes or proportions as used in sample processing. The method blank should be carried through the complete sample preparation and analytical procedure. The method blank is used to document contamination resulting from the analytical process.

Method Detection Limit (MDL): The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix type containing the analyte.

Reportable Detection Limit (RDL): The lowest concentration that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions. For many analytes the RDL analyte concentration is selected as the lowest non-zero standard in the calibration curve. While the RDL is approximately 5 to 10 times the MDL, the RDL for each sample takes into account the sample volume/weight, extract/digestate volume, cleanup procedures and, if applicable, dry weight correction. Sample RDLs are highly matrix-dependent.

Surrogate: An organic compound which is similar to the target analyte(s) in chemical composition and behavior in the analytical process, but which is not normally found in environmental samples. These compounds are spiked into all blanks, standards, and samples prior to analysis. Percent recoveries are calculated for each surrogate.

Continuing Calibration Verification: The calibration relationship established during the initial calibration must be verified at periodic intervals. Concentrations, intervals, and criteria are method specific.

Validated by:
Nicole Leja

CASE NARRATIVE:

Data has been reported to the RDL. This report excludes estimated concentrations detected below the RDL and above the MDL (J-Flag).

The samples were received 2.4 degrees Celsius, please refer to the Chain of Custody for details specific to temperature upon receipt. An infrared thermometer with a tolerance of +/- 1.0 degrees Celsius was used immediately upon receipt of the samples.

If a Matrix Spike (MS), Matrix Spike Duplicate (MSD) or Duplicate (DUP) was not requested on the Chain of Custody, method criteria may have been fulfilled with a source sample not of this Sample Delivery Group.

There is no relevant protocol-specific QC and/or performance standards non-conformances to report.

Report Date:
18-Jun-14 16:05

☑ Final Report
☐ Re-Issued Report
☐ Revised Report

SPECTRUM ANALYTICAL, INC.
Featuring
HANIBAL TECHNOLOGY

Laboratory Report

Converse Laboratories
800 Starbuck Ave - Suite B101
Watertown, NY 13601
Attn: Donna K. Zang

Project: Metro Paper Industries of NY - Carthage, NY
Project #: SA14-0442 Metro Paper Industries of NY

Laboratory ID	Client Sample ID	Matrix	Date Sampled	Date Received
SB90772-01	Plant	Waste Water	03-Jun-14 09:00	05-Jun-14 21:00

I attest that the information contained within the report has been reviewed for accuracy and checked against the quality control requirements for each method. These results relate only to the sample(s) as received.
All applicable NELAC requirements have been met.

Massachusetts # M-MA138/MA1110
Connecticut # PH-0777
Florida # E87600/E87936
Maine # MA138
New Hampshire # 2538
New Jersey # MA011/MA012
New York # 11393/11840
Pennsylvania # 68-04426/68-02924
Rhode Island # 98
USDA # S-51435

NELAP ACCREDITED TNI LABORATORY

Authorized by:

Nicole Leja
Laboratory Director

Spectrum Analytical holds certification in the State of New York for the analytes as indicated with an X in the "Cert." column within this report. Please note that the State of New York does not offer certification for all analytes. Please refer to our website for specific certification holdings in each state.
Please note that this report contains 5 pages of analytical data plus Chain of Custody document(s). When the Laboratory Report is indicated as revised, this report supersedes any previously dated reports for the laboratory ID(s) referenced above. Where this report identifies subcontracted analyses, copies of the subcontractor's test report are available upon request. This report may not be reproduced, except in full, without written approval from Spectrum Analytical, Inc.

Spectrum Analytical, Inc. is a NELAC accredited laboratory organization and meets NELAC testing standards. Use of the NELAC logo however does not insure that Spectrum is currently accredited for the specific method or analyte indicated. Please refer to our "Quality" web page at www.spectrum-analytical.com for a full listing of our current certifications and fields of accreditation. States in which Spectrum Analytical, Inc. holds NELAC certification are New York, New Hampshire, New Jersey, Pennsylvania and Florida. All analytical work for Volatile Organic and Air analysis are transferred to and conducted at our 830 Silver Street location (NY-11840, NJ-MA012, PA-68-04426 and FL-E87936).

Please contact the Laboratory or Technical Director at 800-789-9115 with any questions regarding the data contained in this laboratory report.

Sample Acceptance Check Form

Client:	Converse Laboratories
Project:	Metro Paper Industries of NY - Carthage, NY / SA14-0442 Metro Paper Industries of NY
Work Order:	SB90772
Sample(s) received on:	6/5/2014
Received by:	Vickie Knowles

The following outlines the condition of samples for the attached Chain of Custody upon receipt.

	Yes	No	N/A
1. Were custody seals present?	☐	☑	☐
2. Were custody seals intact?	☐	☐	☑
3. Were samples received at a temperature of ≤ 6°C?	☑	☐	☐
4. Were samples cooled on ice upon transfer to laboratory representative?	☐	☑	☐
5. Were samples refrigerated upon transfer to laboratory representative?	☑	☐	☐
6. Were sample containers received intact?	☑	☐	☐
7. Were samples properly labeled (labels affixed to sample containers and include sample ID, site location, and/or project number and the collection date)?	☑	☐	☐
8. Were samples accompanied by a Chain of Custody document?	☑	☐	☐
9. Does Chain of Custody document include proper, full, and complete documentation, which shall include sample ID, site location, and/or project number, date and time of collection, collector's name, preservation type, sample matrix and any special remarks concerning the sample?	☑	☐	☐
10. Did sample container labels agree with Chain of Custody document?	☑	☐	☐
11. Were samples received within method-specific holding times?	☑	☐	☐

10

SB 907726K

SPECTRUM ANALYTICAL, INC.
Featuring
HANIBAL TECHNOLOGY

CHAIN OF CUSTODY RECORD

Page 1 of 1

Special Handling:

- [x] Standard TAT - 7 to 10 business days
- [ ] Rush TAT - Date Needed: _____

All TATs subject to laboratory approval
Min. 24-hr notification needed for rushes
Samples disposed after 60 days unless otherwise instructed.

Report To: Converse Laboratories, Inc.
800 Starbuck Ave, suite 101B
watertown, NY 13601

Telephone #: (315) 788-8388
Project Mgr: Donna Zang

Invoice To: Converse Laboratories

P.O No.: SA14-0442 Quote/RQN: _____

Project No: SA14-0442 Metro Paper Industries of NY
Site Name: _____
Location: _____ State: NY
Sampler(s): Charles Shampine

F=Field Filtered 1=Na_2S2O_3 2=HCl 3=H_2SO_4 4=HNO_3 5=NaOH 6=Ascorbic Acid
7=CH_3OH 8=$NaHSO_4$ 9=Deionized Water 10=H_3PO_4 11= None 12= 5 & 6

List Preservative Code below:

DW=Dinking Water GW=Groundwater SW=Surface Water WW=Waste Water
O=Oil SO=Soil SL=Sludge A=Indoor/Ambient Air *SG=Soil Gas
X1= DI Water X2= Paint Chips X3= Pond Water

G= Grab C=Composite

Lab ID	Sample ID	Date	Time	Type	Matrix	Containers: # of VOA Vials	# of Amber Glass	# of Clear Glass	# of Plastic	Analysis: *METALS	Cyanide	Check for Information
	Plant	6/3/2014	9:00 AM	G	WW				2	X	X	

2 4 10 B.4 IR 01
6/5/14 JE

QA/QC Reporting Notes:
(additional charges may apply)

MA DEP MCP CAM Report? Yes No
CT DPH RCP Report? Yes No
Standard No QC
DQA*
ASP A* ASP B*
NJ Reduced* NJ Full*
Tier II* Tier IV*
Other:
State-specific reporting standards:

*Cd / Cr / Cu / Ni / Ag / Zn / As / Pb / Hg

Relinquished by:	Received by:	Date:	Time:	Temp °C
C.D. Cronin/CLI		6/5/2014	3:15	Observed:
		6-5-14	4:55	Corrected:
		6/5/14	2100	Thermometer ID:

- [ ] EDD format: _____
- [ ] E-mail to: _____

Condition upon receipt: Custody Seals: Present Intact Broken
Ambient Iced Refrigerated DI VOA Frozen Soil Jar Frozen

SB90772

SPECTRUM ANALYTICAL, INC.
Featuring
HANIBAL TECHNOLOGY

CHAIN OF CUSTODY RECORD

Page 1 of 1

Special Handling:

- [x] Standard TAT - 7 to 10 business days
- [ ] Rush TAT - Date Needed: _____

All TATs subject to laboratory approval
Min. 24-hr notification needed for rushes
Samples disposed after 60 days unless otherwise instructed.

Report To: Converse Laboratories, Inc.
800 Starbuck Ave, suite 101B
watertown, NY 13601

Telephone #: (315) 788-8388
Project Mgr: Donna Zang

Invoice To: Converse Laboratories

P.O No.: SA14-0442 Quote/RQN: _____

Project No: SA14-0442 Metro Paper Industries of NY
Site Name: _____
Location: _____ State: NY
Sampler(s): Charles Shampine

F=Field Filtered 1=Na_2S2O_3 2=HCl 3=H_2SO_4 4=HNO_3 5=NaOH 6=Ascorbic Acid
7=CH3OH 8=$NaHSO_4$ 9=Deionized Water 10=H_3PO_4 11= None 12= 5 & 6

DW=Dinking Water GW=Groundwater SW=Surface Water WW=Waste Water
O=Oil SO=Soil SL=Sludge A=Indoor/Ambient Air SG=Soil Gas
X1= DI Water X2= Paint Chips X3= Pond Water

G= Grab C=Composite

Lab ID:	Sample ID:	Date:	Time:	Type	Matrix	Containers: # of VOA Vials	# of Amber Glass	# of Clear Glass	# of Plastic		Analysis: *METALS	Cyanide							Check if chlorinated	QA/QC Reporting Notes: * additional charges may appply
											List Preservative Code below:		4	5						
	Plant	6/3/2014	9:00 AM	G	WW				2		X	X							☐	* Cd / Cr / Cu / Ni / Ag / Zn / As / Pb / Hg
																			☐	
																			☐	
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																			☐	

MA DEP MCP CAM Report? ☐ Yes ☐ No
CT DPH RCP Report? ☐ Yes ☐ No
☐ Standard ☐ No QC ☐ DQA*
☐ ASP A* ☐ ASP B*
☐ NJ Reduced* ☐ NJ Full*
☐ Tier II* ☐ Tier IV*
☐ Other: _____
State-specific reporting standards:

Relinquished by:	Received by:	Date:	Time:
C.D. Cronin/CLI		6/5/2014	3:15

Temp °C
Observed:
Correction Factor:
Corrected:
IR ID # 22

☐ EDD format: _____
☐ E-mail to: _____

Condition upon receipt: Custody Seals: ☐ Present ☐ Intact ☐ Broken
☐ Ambient ☐ Iced ☐ Refrigerated ☐ DI VOA Frozen ☐ Soil Jar Frozen

1- COMMUNITY RIGHT TO KNOW

REPORTABLE QUANTITIES ON RELEASE MUST BE REPORTED IN 24hr.